

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RYAN FINNESEY,

Plaintiff,

-against-

RJM ACQUISITIONS FUNDING,

Defendant.

CASE NO. 1:11-cv-06439-GBD

MOTION FOR LEAVE TO WITHDRAW

NOW COMES Shireen Hormozdi and Krohn & Moss (collectively as “Counsel”), and pursuant to Local Civil Rule 1.4, files this Motion for Leave to Withdraw as counsel for Plaintiff, Richard Rush (“Plaintiff”) in this matter, and in support thereof, states as follows:

1. Irreconcilable differences have arisen between Counsel and Plaintiff, and Counsel does not believe those differences can be restored.
 2. Specifically, counsel has made numerous attempts to communicate with Plaintiff about his case in an effort to effectively represent Plaintiff.
 3. Said attempts include, but are not limited to, placing telephone calls and sending written correspondence to Plaintiff’s known address via USPS (certified with confirmation of delivery).
 4. Plaintiff has failed to respond to Counsel’s numerous attempts at communication.
 5. Counsel has provided prior notice to Plaintiff its intent to withdraw from representation if Plaintiff continued to ignore Counsel’s attempts to communicate with Plaintiff.
- Further, a true and correct copy of this motion will be served upon Plaintiff at the last known address for Plaintiff.

6. Papers may continue to be served on Counsel until Counsel's appearance has been withdrawn.

WHEREFORE, Counsel respectfully requests this Honorable Court grant leave to withdraw his appearance and representation of Plaintiff, and for any other relief this court deems proper. A proposed form of order is simultaneously filed herewith.

RESPECTFULLY SUBMITTED,

By: /s/ Shireen Hormozdi
Shireen Hormozdi
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Los Angeles, CA 90025
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CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2012, a true and correct copy of the foregoing **Motion for Leave to Withdraw as Counsel** was filed and served on the following via the following Court's CM/ECF filing system:

Jonathan D. Elliot
Zeldes, Needle & Cooper, P.C.
1000 Lafayette Blvd.
Bridgeport CT 06604

and on the following by placing the same in the U.S. Mail at Chicago, Illinois, enclosed in an envelope with first class postage prepaid thereon:

Ryan Finnesey
121 W 72nd Street, Apartment 4E
New York, NY 10023

By: /s/ Adam T. Hill
Adam T. Hill